

Exhibit A

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Attorneys for Plaintiff
ORACLE AMERICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.

Plaintiff,

v.

GOOGLE, INC.

Defendant.

Case No. 3:10-cv-03561-WHA

**PLAINTIFF'S INTERROGATORIES
TO DEFENDANT GOOGLE INC.,
SET ONE**

Dept.: Courtroom 9, 19th Floor
Judge: Honorable William H. Alsup

1 **INTERROGATORY NO. 3:**

2 Please explain the factual and legal bases for Google's pleading of its first affirmative
3 defense: No Patent Infringement.

4 **INTERROGATORY NO. 4:**

5 Please explain the factual and legal bases for Google's pleading of its third affirmative
6 defense: Patent Unenforceability (Waiver, Estoppel, Laches).

7 **INTERROGATORY NO. 5:**

8 Please explain the factual and legal bases for Google's pleading of its fourth affirmative
9 defense: Substantial Non-Infringing Uses (Patent).

10 **INTERROGATORY NO. 6:**

11 Please explain the factual and legal bases for Google's pleading of its fifth affirmative
12 defense: Limitation On Patent Damages.

13 **INTERROGATORY NO. 7:**

14 Please explain the factual and legal bases for Google's pleading of its sixth affirmative
15 defense: Misuse.

16 **INTERROGATORY NO. 8:**

17 Please explain the factual and legal bases for Google's pleading of its eighth affirmative
18 defense: Use By The United States.

19 **INTERROGATORY NO. 9:**

20 Please explain the factual and legal bases for Google's pleading of its tenth affirmative
21 defense: Elements Not Protected by Copyright.

22 **INTERROGATORY NO. 10:**

23 Please explain the factual and legal bases for Google's pleading of its eleventh affirmative
24 defense: Copyright Unenforceability (Waiver, Estoppel, Laches).

25 **INTERROGATORY NO. 11:**

26 Please explain the factual and legal bases for Google's pleading of its twelfth affirmative
27 defense: Fair Use.

INTERROGATORY NO. 12:

Please explain the factual and legal bases for Google's pleading of its fourteenth affirmative defense: No Intent to Induce Copyright Infringement.

INTERROGATORY NO. 13:

Please explain the factual and legal bases for Google's pleading of its fifteenth affirmative defense: Independent Creation.

INTERROGATORY NO. 14:

Please explain the factual and legal bases for Google's pleading of its sixteenth affirmative defense: Third Party Liability.

INTERROGATORY NO. 15:

Please explain the factual and legal bases for Google's pleading of its seventeenth and eighteenth affirmative defenses: License and Implied License.

INTERROGATORY NO. 16:

Please explain the factual and legal bases for Google's pleading of its nineteenth affirmative defense: Unclean Hands.

Dated: December 2, 2010

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By: /s/ Marc David Peters

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ORACLE AMERICA, INC.